

REMARKS

Claims 27-39 are pending in this application. No claim amendments have been made in the present Response.

ALLOWABLE SUBJECT MATTER

Applicants gratefully acknowledge the Examiner's indication that claims 27-33 are allowed and that claims 37-39 would be allowable if rewritten to overcome the rejections under 35 U.S.C. § 112, second paragraph, and to include all of the limitations of the base claim and any intervening claims.

REJECTIONS UNDER 35 U.S.C. § 112

Reconsideration is respectfully requested of the rejection of claims 34-39 under 35 U.S.C. § 112 as being indefinite for failing to particularly point out and distinctly claim the subject matter which applicant regards as the invention.

The Examiner maintains that claim 34 "is confusing due to a typographical error", and states that Applicants should amend claim 34 to recite "the coater coating the photosensitive layer on the substrate by the discharging unit" instead of "the coater coating the photosensitive layer on the substrate by the unit substrate".

Applicants respectfully submit that the phrase "by the unit substrate" as it is used in claim 34 describes that the photosensitive layer is being coated "per or via each unit substrate." For example, as shown in Applicants' disclosure, the discharging unit may include an outlet divider 131, or a spacer block 250, which is equal to the distance between the unit substrates to cause the layer to be coated only onto the unit substrates 10, 20. See, e.g., Applicants' Disclosure, Figs. 2B, 3, 4, 5A and 5B; and ¶¶ 0015 and 0048-49.

Accordingly, Applicants respectfully submit that it is not necessary to amend claim 34, since claim 34 does not include a typographical error.

Therefore, Applicants respectfully request that the Examiner's indefiniteness rejection of claims 34-39 under 35 U.S.C. § 112 be withdrawn.

REJECTION UNDER 35 U.S.C. § 103

Reconsideration is respectfully requested of the rejection of claims 34-36 under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,398,870 ("Kaya") in view of U.S. Patent No. 3,753,085 ("Morton").

Reconsideration is also respectfully requested of the rejection of claims 34-36 under 35 U.S.C. § 103(a) as being unpatentable over Kaya in view of Morton, and, if necessary, U.S. Patent Nos. 5,575,852 ("Chase") and 3,924,565 ("Benner").

Kaya And Morton Disclose Marking, Not Coating Devices

Claim 34 recites, inter alia, an apparatus for coating a photosensitive layer on a substrate, and a coater coating the photosensitive layer on the substrate.

For example, Applicants' disclosure describes coating as a process by which a layer of substance is uniformly applied to portions of a substrate. See, e.g., Fig. 2A, and ¶ 0052 (stating that "coating uniformity of the unit substrate can be improved"). Moreover, a dictionary definition defines coating as covering or spreading with a layer. See Merriam-Webster OnLine Dictionary, www.m-w.com/cgi-bin/dictionary.

In contrast to the claimed embodiment, Kaya and Morton disclose marking apparatuses, which detect defects on a subject and mark the defects with sprays. The devices in Kaya and Morton spray substances at or near a defect to point out a location of a defect. The marks do not result in a coated layer. See, e.g., Kaya, col. 2, lines 43-

51 and Morton, col. 3, lines 11-24. Indeed, the marking solution of Kaya, for example, is easily removable by wiping, even after it is dried. See Kaya, col. 3, lines 10-15.

Accordingly, Applicants respectfully submit that the cited references do not disclose coating, as recited in claim 34, and therefore, claim 34 is patentable over the cited references for at least this reason.

The Cited References Do Not Disclose Coating By The Unit Substrate

Applicants respectfully submit that the cited references do not disclose a coater coating the photosensitive layer on the substrate by the unit substrate, as recited in claim 34.

As stated above, the phrase "by the unit substrate" as it is used in claim 34 describes that the photosensitive layer is being coated "per or via each unit substrate", whereby the configuration of the discharging unit allows the layer to be coated only onto the unit substrates 10, 20. See, e.g., Applicants' Disclosure, Figs. 2B, 3, 4, 5A and 5B; and ¶¶ 0015 and 0048-49.

In contrast to the claimed embodiment, Kaya, Morton, Chase and Benner all disclose spraying devices, which apply a substance in a general location. There is no configuration in the cited references for coating by the unit substrate as claimed.

For example, the marks generated by the devices of Kaya and Morton are in the general location of the defects, and are not applied with the accuracy and precision required to coat by the unit substrate. See, e.g., Kaya, col. 3, lines 6-9 and 64-66 (stating that the piezo pump 32 can be pivoted toward the spot and the marking solution can be applied onto the spot or in the vicinity of the spot).

Moreover, the nature of spraying is such that precision is lost, resulting in

scattering of the sprayed material. See, e.g., Morton, col. 3, lines 15-20 (requiring that the spray device S be positioned away from the apparatus A so as to avoid spraying paint on the apparatus A).

Accordingly, Applicants respectfully submit that the cited references do not disclose coating by the unit substrate, as recited in claim 34, and therefore, claim 34 is patentable over the cited references for at least this reason.

For at least the reason that claims 35 and 36 depend from claim 34, claims 35 and 36 are also submitted to be patentably distinct over the cited references.

As such, Applicants respectfully request that the Examiner withdraw the rejections of claims 34-36 under 35 U.S.C. § 103(a).

DEPENDENT CLAIMS

Applicants have not independently addressed the rejections of all the dependent claims because Applicants submit that for at least similar reasons as why the independent claims from which the dependent claims depend are believed allowable as discussed, *supra*, the dependent claims are also allowable. Applicants, however, reserve the right to address any individual rejections of the dependent claims should such be necessary or appropriate.

An early and favorable reconsideration is earnestly solicited. If the Examiner has any further questions or comments, the Examiner may telephone Applicants' Attorney to reach a prompt disposition of this application.

Respectfully submitted,



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